

**United States Bankruptcy Court
Western District of Oklahoma**

In re Ladoria Shaw

Debtor(s)

Case No. 19-10524-JDLChapter 13

**DEBTOR'S MOTION FOR CONTINUATION OF AUTOMATIC STAY,
NOTICE OF OPPORTUNITY FOR HEARING AND NOTICE OF HEARING**

The debtor, Ladoria Shaw ("Debtor"), through her attorney, Joshua Farmer, requests that the Court extend the automatic stay under 11 U.S.C. § 362(a) as to all creditors pursuant to 11 U.S.C. §362(c)(3)(B). In support of her request, Debtor states as follows:

1. Debtor filed a petition under Chapter 13 on February 18, 2019.
2. Debtor previously filed a Chapter 13 case on May 25, 2018, and the case was assigned case number 18-12207. The case was dismissed on November 26, 2018. This was the only previous case pending during the preceding year.
3. Debtor's previous case was dismissed for non-feasibility after confirmation. Since that time, Debtor's household income has increased and as a result Debtor is now able to fully perform under the terms of the Chapter 13 Plan.
4. Debtor's monthly net income is \$4727.50 and the Debtor has approximately \$2502.32 per month in living expenses, leaving \$2222.18 per month as their disposable income, an amount that is sufficient to fund her Chapter 13 Plan.
5. The petition in this case has been filed in good faith as to all creditors. Debtor believes that the Chapter 13 plan she has submitted will be confirmed and that she will be able to fully perform under the terms of the plan.
6. The Debtor's prior chapter 13 case was not dismissed because the Debtor failed to file or amend her petition or any required documents, or to provide adequate protection payments ordered by the court.
7. The Debtor's prior chapter 13 case was not dismissed at a time when there had been a motion for relief that was pending before the court or resolved with an order terminating, conditioning, or limiting the stay.

NOTICE OF OPPORTUNITY FOR HEARING

Your rights may be affected. You should read this document carefully and consult your attorney about your rights and the effect of this document. If you do not want the Court to grant the requested relief, or you wish to have your views considered, you must file a written response or objection to the requested relief with the Clerk of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102 no later than 14 days from the date of filing of this request for relief. You should also serve a file stamped copy of your response or objection to the undersigned movant/movant's attorney [and others who are required to be served] and file a certificate of service with the Court. If no response or objection is timely filed, the Court may grant the requested relief without a hearing or further notice. The 14 day period includes the three (3) days allowed for mailing provided for in Bankruptcy Rule 9006(f).

WHEREFORE, Debtor requests that this Court continue the automatic stay under §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

Dated: February 21, 2019

Respectfully submitted,

By: /s/ Joshua Farmer

Joshua Farmer, CA302846

Attorney for Debtor(s)

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NOTICE OF HEARING

Notice is hereby given that if a response to the Debtors' Motion for Continuation of the Automatic Stay is filed, the hearing on the matter will be held on March 12, 2019 at 2:00 p.m. in the second floor courtroom of the United States Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Avenue, Oklahoma City, OK 73102. If no response is timely filed and the court grants the requested relief prior to the above-referenced hearing date, the hearing will be stricken from the docket of the Court.

CERTIFICATE OF SERVICE

This is to certify that on February 21, 2019 a true and correct copy of the Debtor's Motion to Motion for Continuation of Automatic Stay, Notice of Opportunity for Hearing and Notice of Hearing, filed on February 21, 2019, was forwarded via U.S. Mail, first class, postage prepaid, to the attached creditor's list, and that I also filed the same on line at the Court's Web Site so as to make it available on PACER.

/s/ Joshua L. Farmer
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1087-5
Case 19-10524
Western District of Oklahoma
Oklahoma City
Thu Feb 21 10:34:53 CST 2019

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215 Dean A. McGee
Oklahoma City, OK 73102-3426

American Collection Services
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Oklahoma City OK 73119-6416

Credit Collection Services
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Norwood MA 02062-2679

Credit One Bank
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End of Label Matrix
Mailable recipients 9
Bypassed recipients 0
Total 9